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Sheryl Claypool, Scott Claypool and Kristen Claypool

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

DENNIS CLAYPOOL, individually	)	Civil No. CV04 00570 HG- BMK
and as Guardian Ad Litem for	)	
KRISTEN CLAYPOOL, a minor,	)	
SHERYL CLAYPOOL, SCOTT	)	
CLAYPOOL, and KRISTEN	)	DECLARATION OF SUSAN
CLAYPOOL,	)	MORSE
Plaintiffs,	)	
vs.	)	
	)	
CAPTAIN ANDY'S SAILING, INC.,	)	
BLUE DOLPHIN CHARTERS, LTD.	)	
and BLUE DOLPHIN DIVING,	)	
INC.,	)	
Defendants.	)	
	)	

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MATTHEW ISHAM, individually ) CIVIL NO. CV04-00559 HG-BMK  
and as Guardian ad Litem for )  
HAYDEN ISHAM, a minor; )  
ROXANNE BEST ISHAM, )  
 )  
Plaintiffs, )  
vs. )  
 )  
BLUE DOLPHIN CHARTERS, )  
LTD. and BLUE DOLPHIN )  
DIVING, LTD., CAPTAIN )  
ANDY'S SAILING, INC., )  
 )  
Defendants. )

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IN THE MATTER OF THE ) Civil No. CV05-00037 HG BMK  
COMPLAINT OF BLUE DOLPHIN )  
CHARTERS, LTD. AND TERRY )  
DONNELLY, AS OWNERS OF )  
THE VESSEL M/V BLUE )  
DOLPHIN, O/N 1082212, FOR )  
EXONORATION FROM AND/OR )  
LIMITATION OF LIABILITY )

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I, SUSAN MORSE, hereby state and affirm that:

1. I am an adult resident of the State of Arizona. I have been a personal friend of Dennis and Sheryl Claypool for about 10 years. Before his July 20,2004

accident in Kauai, Dennis helped build and fix many things in and around my house. I am very familiar with Dennis's abilities prior to the accident and his limitations after it.

2. Before his accident, Dennis was a talkative, generous person. He was also exceptionally handy and helped me with many things around my house. Dennis moved furniture, picked up and installed hot water heaters, fixed lighting, fixed door locks, fixed garage doors, preformed car and yard maintenance, repaired appliances, hung Christmas lights, hauled my trash and maintained my plumbing. Since his accident, Dennis is no longer capable of providing this help. In fact, he can no longer do any of these things. It is obvious to me that this fact is very difficult for him.

I have reviewed the foregoing declaration, and can confirm under penalty of perjury under the laws of the State of Hawaii that the facts and opinions contained therein are true and correct, and personally known to me, and that if I were called as a witness herein, I could competently so testify under oath.

Executed on this 3<sup>rd</sup> day of April, 2006, in the City of Mesa, State of Arizona.

*Deborah Tweeten*

*Susan Morse*  
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Susan Morse

